

ADDENDUM TO THE FACT SHEET  
FOR NATIONAL POLLUTANT DISCHARGE  
ELIMINATION SYSTEM (NPDES)  
PERMIT NO. WA WA0003352  
October 2009

I. GENERAL INFORMATION

Facility: Washington Crab Producers  
1907 Nyhus Street  
Westport, WA 98595

II. APPLICATION REVIEW

Washington Crab Producers (WCP) submitted an application to the Department of Ecology (Ecology) on January 7, 2009, for permit reissuance, and Ecology accepted it on February 5, 2009. Ecology has sufficiently reviewed the application, discharge monitoring reports, and other facility information in enough detail to ensure that:

- The discharge meets most of the applicable effluent standards and limits, water quality standards, and other legally applicable requirements. Review of the discharge monitoring reports showed that WCP sometimes could not meet some of its permit limits. An Ecology site inspection, conducted on August 25, 2009, as part of the permit re-issuance process, revealed that the high fecal coliform levels at this facility may not originate from the seafood processing wastewater. Please refer to Appendix B for more detailed information.
- WCP has complied with most of the terms, conditions, requirements and schedules of compliance of the expired permit. The 2005 permit required WCP to submit an engineering report addressing installation of a disinfection device to Ecology approval. WCP provided an engineering report to Ecology on November 1, 2005. Ecology provided comments on the report to WCP on December 21, 2005. However, there is no information on file that indicates WCP responded to Ecology's comments. The proposed permit requires WCP to review its wastewater collection, conveyance and treatment system to identify measures, either additional treatment system or BMPs to address the effluent quality issues. Please refer to Appendix B for more detailed information.
- Ecology has up-to date information on the WCP's waste treatment practices, the facility's production levels; and the nature, content, volume, and frequency of its discharge.

III. PERMIT REAUTHORIZATION

When Ecology reauthorizes a discharge permit it essentially reissues the permit with the existing limits, terms and conditions. Alternatively, when Ecology renews a permit it re-evaluates the impact of the discharge on the receiving water which may lead to changes in the limits, terms and conditions of the permit.

This fact sheet addendum accompanies the permit, which Ecology proposes to reauthorize for the discharge of wastewater to Half Moon Bay. The previous fact sheet explains the basis for the

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discharge limitations and conditions of the reauthorized permit and remains as part of the administrative record.

Ecology determined it does not need to change the existing discharge limits and to protect the receiving water quality. The previous fact sheet addressed conditions and issues at the facility at the time when Ecology issued the previous permit in 2005. Since the issuance of the current permit, Ecology has not received any additional information which indicates that environmental impacts from the discharge warrant a complete renewal of the permit. The reauthorized permit is virtually identical to the previous permit issued on January 13, 2005 except for revisions to the engineering report requirements.

Ecology reviewed inspections and assessed compliance of WCP's discharge with the terms and conditions in the previous permit and determined that it should not rank the facility as a high priority for permit renewal. Ecology assigns a high priority for permit renewals in situations where water quality would benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, along with the renewal of high priority permits, allows Ecology to reissue permits in a timely manner and minimize the number of active permits that have passed their expiration dates. For permit reissuance planning purposes, Ecology follows a system of ranking that considers the benefit gained by renewing a permit rather than reauthorizing a permit during its annual permit planning process. Ecology assesses each permit that is expiring and due for reissuance and compares it with other permits due for reissuance. Ecology notifies the public and seeks input after it has tentatively established the initial draft ranking of the permits it plans to renew and those it plans to reauthorize. Ecology considers all relevant comments and suggestions before it makes a final decision.

Ecology carried over the discharge limits and conditions in effect at the time of expiration of the previous permit to this reauthorized permit. Ecology only changed the engineering report submittal requirements from those in the previous permit. Ecology considers that the revised engineering report requirement will allow WCP to review/evaluate its entire wastewater system and identify/develop more environmentally sound approaches for treating wastewater.

Ecology must public notice the availability of the draft reauthorized permit at least 30 days before it reissues the permit [Washington Administrative Code (WAC) 173-220-050]. Ecology invites you to review and comment on its decision to reauthorize the permit (see Appendix A-Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, Ecology will prepare a response to comments document that it will attach to this fact sheet addendum. The response to comments will include the resultant changes to the permit and either addresses each comment individually or summarizes the substantive comments and respond. Ecology sends a copy of the response to comments to all parties who submitted comments. Ecology will include the response to comments in this fact sheet addendum.

#### IV. RECOMMENDATION FOR PERMIT ISSUANCE

Ecology proposes to reissue this permit for five years.

## **APPENDIX A--PUBLIC INVOLVEMENT INFORMATION**

Ecology proposes to reissue a permit to Washington Crab Producers. The permit includes wastewater discharge limits and other conditions. This fact sheet addendum describes the facility and Ecology's reasons for reauthorizing the permit conditions.

Ecology placed a Public Notice of Application on June 11, 2009, and June 18, 2009, in the *Daily World* to inform the public about the submitted application and to invite comment on the reissuance of this permit.

Ecology will place a Public Notice of Draft on date in the *Daily World* to inform the public and to invite comment on the proposed draft National Pollutant Discharge Elimination System permit and fact sheet addendum.

The Notice –

- Tells where copies of the draft Permit and Fact Sheet are available for public evaluation (a local public library, the closest Regional or Field Office, posted on our website.).
- Offers to provide the documents in an alternate format to accommodate special needs.
- Urges people to submit their comments, in writing, before the end of the Comment Period
- Tells how to request a public hearing of comments about the proposed NPDES Permit.
- Explains the next step(s) in the permitting process.

Ecology has published a document entitled **Frequently Asked Questions about Effective Public Commenting** which is available on our website at <http://www.ecy.wa.gov/biblio/0307023.html>.

You may obtain further information from Ecology by telephone, 360-407-6280, or by writing to the permit writer at the address listed below.

Industrial Unit Permit Coordinator  
Department of Ecology  
Southwest Regional Office  
P.O. Box 47775  
Olympia, WA 98504-7775

The primary author of this permit and fact sheet is Gary Lee.

## **APPENDIX B**

### **Facility and Industrial Process Information:**

WCP is a shrimp and crab processing facility that processes wild-harvested crabs and shrimps from local water and from sources in Alaska. Shrimps and crabs are cleaned, shelled, cooked and packaged as fresh, frozen and canned product. Processing activities at the facility is relatively to the seasonal variability of the resources, quantities of which vary from year to year. Process wastewater generated at the facility includes cooling water for cooked products and cleanup water. Wastewater is collected via floor drains and pipes that convey the water to a collection sump outside the building. The process wastewater is combined with stormwater runoff from the parking lot and alley as well as roof drains in the sump. The mixed water in the sump is then pumped to and discharged over a 40-mesh tangential screen for solid removal. After the solid removal, effluent from the screen is discharged to the City of Westport sewage manhole on the outfall side of the City treatment plant via a gravity line. WCP has an agreement with the City to share the City's effluent outfall.

### **Permit Status:**

Ecology issued a National Pollutant Discharge Elimination System Waste Discharge Permit No. WA 0003352 effective on July 1, 2005 to WCP allowing the facility to discharge treated process wastewater via City of Westport treatment plant outfall to Half Moon Bay, City of Grays Harbor (Latitude: 46° 54' 29"N; Longitude: 124° 06' 45" W). The current permit expires on July 1, 2010 and places effluent limitations on flow, pH, biochemical oxygen demand, total suspended solids, fecal coliform and oil and grease. The permit limits were derived based on the effluent standards established in 40 CFR Part 408 subpart H ([Subpart H--DUNGENESS AND TANNER CRAB PROCESSING IN THE CONTIGUOUS STATES SUBCATEGORY](#)) and K ([Subpart K--NORTHERN SHRIMP PROCESSING IN THE CONTIGUOUS STATES SUBCATEGORY](#)), and Chapter 173-201A WAC except the fecal coliform limit which is based on the AKART for municipal treatment plants.

### **Compliance Status:**

Review of facility DMRs for the period between June 1, 2005, and June 1, 2009, revealed that wastewater discharged from the facility exceeded the fecal coliform limits (monthly average and daily max) 43 times, O&G limits 14 times, TSS limits 5 times, and BOD limits 3 times.

An Ecology inspection indicated that the cook and wash water from the processing areas may not be the source of fecal coliform contamination in the wastewater. WCP cleans the areas extensively every night and all the seafood processing operations are subject to strict federal and state guidelines and regulations for food processing.

The previous permit required WCP to prepare and submit to Ecology an engineering report addressing installation of a disinfection device for review and approval. WCP submitted an engineering report to Ecology on November 1, 2005, and Ecology provided comments to WCP on December 21, 2005. Ecology responded with concerns regarding the capability of the disinfection system, residual chlorine in the effluent, and the performance of the system under low flow and system clean out conditions. There was no information on file indicating that WCP had responded to Ecology's comments. WCP did not install an on-site wastewater disinfection system. Ecology believes that WCP can reduce the high levels of fecal coliforms in the process wastewater by re-configuring the wastewater collection and conveyance system and implementing BMPs to prevent bird intrusion around the screen and sump area.

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Additional Requirement as the result of non-compliance:

In order to ensure compliance with the permit limits and to protect the receiving water, the proposed permit requires WCP to prepare and submit an engineering report to Ecology for review and approval within 120 days of the permit issuance date. The report must:

- Identify the sources of various contaminants in the wastewater.
- Assess the need to modify the existing wastewater collection and conveyance system.
- Address treatment system and/or BMPs WCP will employ.
- Describe the expected treatment levels.